

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/30/2022

GOTTLIEB & ASSOCIATES
ATTORNEYS

150 E. 18th St., Suite PHR • New York, NY 10003
Tel (212) 228-9795 • Fax (212) 982-6284
NYJG@aol.com

June 28, 2022

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Young v. U.S. Money Reserve, Inc.*,
Case No.: 1:22-cv-2098

Dear Judge Caproni,

The undersigned represents Lawrence Young, (“Plaintiff”) in the above referenced matter against Defendant, U.S. Money Reserve, Inc., (“Defendant”) (collectively the “Parties”). We write, with Defendant’s consent, to inform the Court that the Parties have reached a settlement in principle and respectfully request that Your Honor dismiss this action with prejudice with the right to reopen in forty-five (45) days if the Settlement Agreement is not consummated. In light of the anticipated settlement, the undersigned respectfully requests all currently pending deadlines in this action be adjourned *sine die*.

We thank the Court for its time and attention in this matter.

Respectfully submitted,
/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.

cc: All counsel of record via ECF

Application GRANTED. IT IS HEREBY ORDERED that Plaintiff's claims against U.S. Money Reserve, Inc. are dismissed with prejudice. Within **30 days** of this order, the parties may apply to reopen this case. Any such application must show good cause for holding the case open in light of the parties' settlement. Any request filed after 30 days or without a showing of good cause may be denied solely on that basis.

Additionally, if the parties wish for the Court to retain jurisdiction to enforce their settlement agreement, they must submit within the same **30-day period**: (1) their settlement agreement to the Court in accordance with Rule 7.A of the Court's Individual Practices and (2) a request that the Court issue an order expressly retaining jurisdiction to enforce the settlement agreement. See *Hendrickson v. United States*, 791 F.3d 354 (2d Cir. 2015).

The Clerk of Court is respectfully directed to terminate all open motions and close the case. The Clerk is further directed to amend the case caption to delete the language "on behalf of all others similarly situated" after the individual Plaintiff's name.

SO ORDERED.



Date: 6/30/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE